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7 *Attorneys for Plaintiff*

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9  
10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF NEVADA**

13 K & K RESIDENTIAL LLC, a Nevada limited  
liability company,

Case No.: 2:19-cv-426-JAD-NJK

14 Plaintiff,

15 **STIPULATION AND [PROPOSED]**  
16 **ORDER TO STAY ALL CASE-**  
17 **RELATED DEADLINES**

(First Request)

18  
19 vs.  
20 UNITED STATES OF AMERICA;  
21 CENTRAL TELEPHONE COMPANY d/b/a  
22 CENTURYLINK NEVADA, a Delaware  
corporation; DOE individuals I – X, and  
23 ROE entities I – X, inclusive,

Defendants.

24 Plaintiff K&K Residential LLC (“Plaintiff”) and Defendant Central Telephone Company  
25 d/b/a CenturyLink Nevada (“CenturyLink”), by and through their attorneys of record, hereby  
26 stipulate and request that the Court enter an order staying all case-related deadlines to allow for a  
27 possible early resolution of this case without incurring unnecessary expenses. This stipulation is  
made and based upon the following:

28 1. Plaintiff filed its Complaint for quiet title and declaratory relief against CenturyLink  
and the United States on March 13, 2019. ECF No. 1. Plaintiff seeks to quiet title to an easement on  
a piece of its land that is believed to have been, or currently be, held by the United States,  
CenturyLink, or some other third-party. *Id.*

2. CenturyLink filed its Answer on April 9, 2019. ECF No. 9.

1       3. Since then, Plaintiff has been informed by defendant the United States that the United  
2 States *might* hold title to the easement. Plaintiff and the United States have been working towards  
3 determining whether the United States it does in fact hold title, or whether it transferred it to  
4 CenturyLink or some other third-party. In light of this, Plaintiff has given the United States an open  
5 extension of time to file its response while they work through the process.

6       4. This necessarily requires Plaintiff to work with representatives from the United States  
7 Air Force. Plaintiff is currently cooperating with the Air Force in exchanging documents and  
8 otherwise participating in the Air Force's process.

9       5. Plaintiff is hopeful that the United States does indeed hold title to the easement as the  
10 United States has informed Plaintiff it would be willing to relinquish title. However, based upon  
11 communications with the Air Force, there exists an air of uncertainty that is yet to be resolved.  
12 Plaintiff has been informed by the Air Force that this bureaucratic process takes four to six weeks.

13       6. In light of the fact that Plaintiff and the United States are working to determine  
14 ownership of the easement and, if the United States does hold title, resolve this matter, Plaintiff and  
15 CenturyLink respectfully request that the Court stay all case-related deadlines to allow for a possible  
16 early resolution of this case without incurring unnecessary expenses, and permit Plaintiff and  
17 CenturyLink to file a status report in sixty (60) days.

18       7. This is the first request for the relief sought herein, and it is requested in good faith  
19 and not for purposes of delay.

20 DATED this 23rd day of May, 2019.

21 **MCDONALD CARANO LLP**

DATED this 23rd day of May, 2019.

**GREENBERG TRAURIG, LLP**

22  
23 */s/ Matthew Addison*  
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27 */s/ Jason Hicks*  
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*Attorneys for Plaintiff*

## ORDER

In consideration of the parties' stipulation, and with good cause appearing, IT IS HEREBY ORDERED that all case-related deadlines in this matter are STAYED.

IT IS FURTHER ORDERED that the parties shall file a status report by July 22, 2019.

DATED May 24, 2019

~~UNITED STATES MAGISTRATE JUDGE~~

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